

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARK BERNAL

Defendant.

CASE NO. 8:22CR00222

**UNOPPOSED MOTION FOR ORDER
AUTHORIZING WORK-RELATED
TRAVEL**

COMES NOW the Defendant, by and through counsel, Mallory N. Hughes, and respectfully moves this Court for an Order authorizing work related travel to Lincoln, NE and Chicago, IL during the time period of September 21-24, 2023. In support of this Motion, Counsel for Defendant states:

1. On September 7, 2023, this Court sentenced Mr. Bernal to a period of incarceration of 5 months;
2. This Court—following Mr. Bernal’s request for a self-surrender date in order to attend several work opportunities this fall—permitted self-surrender for Mr. Bernal on a date to be determined by BOP, not sooner than November 6, 2023;
3. Mr. Bernal is seeking travel for work throughout the time period of September 21-24, 2023, where he will be in Lincoln, NE and Chicago, IL. As such, Mr. Bernal is further seeking removal of his GPS in order to travel, from Sept. 21-24, 2023;
4. Counsel for Defendant has conferred with AUSA Christopher Ferretti, and he has no objection to Defendant’s request herein; and

5. Throughout his time on pretrial release, Mr. Bernal was permitted several travel requests by Pretrial, during which his GPS monitor was removed for travel and Mr. Bernal complied with the travel, return date, and resuming of use of the GPS monitor.

DATED: September 14, 2023.

Respectfully submitted,

Mark Bernal, Defendant

/s/ Mallory N. Hughes

Mallory N. Hughes #24610

BERRY LAW FIRM

1414 Harney Street, Suite 400

Omaha, NE 68102

(402) 466-8444

Mallory.hughes@berrylawfirm.com

Attorney for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon the Assistant U.S. Attorney, by electronically serving a copy of the same via CM/ECF, on this the 14th day of September, 2023.

/s/ Mallory N. Hughes #24610

Mallory N, Hughes